

### Chapter 65G-14, F.A.C., SERC Cost Analysis

Under the new regulatory environment		Under the current regulatory environment
To become a Qualified Organization (QO)	Rule	<p>A completed Qualified Organization (“QO”) Application                      A copy of the proposed code of ethics                      A copy of the proposed disciplinary process                      A copy of the proposed mentoring program                      A copy of the proposed policies and procedures                      A copy of each Waiver Support Coordinator’s (“WSC”) provider application or Medicaid Waiver Services Agreement (“MWSA”)                      A table of organization                      Sign the MWSA agreement</p>
	Cost Estimation	<p>The cost driver is the number of QOs. During the most recent fiscal year, there are 172 Provider Agencies (PAs) and 518 solo providers. Out of the 172 PAs, about 40% (16%, 44%) of them have 2 (3, 4 or more) WSCs. We expect the PAs with 4 or more WSCs (76 of them) will apply to become QOs. The 96 PAs with less than 4 WSCs will either merge with larger PAs or merge with each other, forming an additional 48 QOs at most (assuming every two of them form one QO). The 518 solo WSCs will either join existing PAs or form new QOs, resulting in the maximum possible number of newly formed QOs of 129 (518/4). Therefore, the high estimate of the number of QOs is 76+48+129=253 and the low estimate is 76. It will take an existing PA (a newly formed QO) about 1 (2) hour(s) to prepare the application and all documents, so the high estimate of cost is <math>(124*1 + 129*2)*\\$20 = \\$7,640</math> and the low estimate of cost is <math>(76*1)*\\$20 = \\$1,520</math>, assuming a \$20/hour labor cost rate. The mean of the high and low estimated opportunity costs may be a good faith estimate of an initial one time cost of \$4,580. Annually thereafter, it is estimated that 30 new QOs would apply, with an opportunity cost of <math>(30*2)*\\$20 = \\$1,200</math>. For years 2 through 5, the application opportunity cost would be <math>\\$1,200*4=\\$4,800</math>.</p>
		Not applicable.

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Training-related costs for QO leaders	Rule	<p>QO leaders:</p> <ol style="list-style-type: none"> <li>1. must complete Level 1 Training</li> <li>2. attend a minimum of 6 monthly meetings with Agency staff each year and complete required training (each meeting is about 2 hours)</li> </ol>
	Cost Estimation	<p>Level 1 Training is online for 9 hours, which existing WSC agency providers are already required to take (statewide pre-service training). This will only be a cost for a QO leader who is not a WSC (estimated to be 4 since only 4 such PA leaders currently exist).</p> <p>Level 1 Training opportunity cost: 4 leaders * 9 hours * \$40 = \$1,440 (one-time)</p> <p>Currently, all supervisors, directors, and managers of WSC agencies must attend a minimum of 24 hours of job-related in-service training per the iBudget Handbook. That requirement is being replaced with these rules, which require only 6 trainings (approx. 2 hours each) annually.</p> <p>6 meetings/trainings:                      Out-of-pocket cost: 4 leaders * \$50 * 6 = \$1,200                      Opportunity cost: 4 leaders * (2 hours meeting + 2 hours commuting) * \$40 * 6 = \$3,840 (annual)</p>

Out-of-pocket cost: 4 leaders \* \$50 \* 6 = \$1,200  
 4 leaders \* 24 in-service credit hours (annual) \* \$40 = \$3,840 (recurring)

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QO renewal (every 5 years)	Rule	<ol style="list-style-type: none"> <li>1. The current signed MWSA;</li> <li>2. The declaration page of general/professional liability insurance;</li> <li>3. Proof of level 2 background screening; and</li> <li>4. Local criminal records check.</li> </ol>
	Cost Estimation	<p>This is just a matter of locating the documents and submitting them to APD. The cost driver is the number of QOs that need to apply for renewal. Assuming it takes a QO 1 hour to file for renewal, the high estimate of the cost is <math>(253 \text{ QOs}) * (1 \text{ hour}) * (\\$20/\text{hour}) = \\$5,060</math> and the low estimate is <math>(76 \text{ QOs}) * (1 \text{ hour}) * (\\$20/\text{hour}) = \\$1,520</math>. Therefore, a good faith estimate is the average of \$5,060 and \$1,520, which is \$3,290, for every 5 years. Therefore, the annual recurring cost is <math>\\$3,290/5 = \\$658</math></p>
		<p>Same requirement for Provider Agencies ("PA")  <math>(172) * 1 * \\$20 = \\$3,440</math>, for every 5 years.                      Therefore, the annual recurring cost is <math>\\$3,440/5 = \\$688</math></p>

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*Service expansion	Rule	A Qualified Organization that wishes to expand service provision geographically must comply with Rule 65G-4.0215, F.A.C.	
	Cost Estimation	35 * (1 hour) * \$20 = \$700 (annual)	Same requirement for PAs 35 * (1 hour) * \$20 = \$700 (annual)

\*This requirement remains unchanged; QOs will need to follow the same process as all other providers.

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*Reporting of violation(s)	Rule	<p>Each Qualified Organization must report to the Agency any violation of ethical or professional conduct by Support Coordinators employed by that organization within seven (7) calendar days of discovering the violation, unless the violation threatens the health and safety of a client(s). Any violation that could cause a client’s physical, mental, or emotional health to be significantly impaired must be reported to the Agency within 24 hours of discovering the violation.</p>
	Cost Estimation	<p>Not applicable.</p>
		<p>759 * 0.5 hour * \$20 = \$7,590 (annual)</p>

\*Section 393.0663(3), F.S., requires all QOs to report to the agency any violation of ethical or professional conduct by support coordinators employed by the QO. This cost is not attributed to the rules.

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Client Satisfaction Survey	Rule	QO must provide each client or, if applicable, his or her legal representative, with the Client Satisfaction Survey during each client's annual support plan meeting in compliance with the iBudget Handbook.		Not applicable.
	Cost Estimation	35,182 * (0.05 hour) * \$20 = \$35,182 (annual)		

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*Hiring a new support coordinator	Rule	Same requirement. \$7,490 (annual)
	<p>Upon hiring a prospective Support Coordinator who does not have an active MWSA as a Support Coordinator, the Qualified Organization must submit the provider application and, if applicable, the dual employment plan.</p> <p>Upon hiring a Support Coordinator with a Medicaid provider number or upon request by the Agency, the Qualified Organization must submit the following information regarding that Support Coordinator to the appropriate Regional Office that includes:</p> <ol style="list-style-type: none"> <li>1. The Support Coordinator's first and last name;</li> <li>2. The Support Coordinator's Medicaid provider number;</li> <li>3. Validation that the Support Coordinator is compliant with training required by section 393.0663(2)(b)11., F.S.; the iBudget Handbook; and Chapter 65G-10, F.A.C.; and</li> <li>4. Any disclosures regarding dual employment of the Support Coordinator.</li> </ol>	
Cost Estimation	<p>This is just a matter of gathering the information needed and submitting it to APD. The cost driver is the number of newly hired WSCs in a year. There are 749 WSC-Provider ID combinations in the 2020 list that were not in the 2019 list. Assuming a QO takes 30 minutes to file for a new hire, the cost is <math>(749 \text{ new hires}) * (0.50 \text{ hour}) * (\\$20/\text{hour}) = \\$7,490</math> per year.</p>	

\*These rules do not change the requirements for hiring new WSCs.

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Support coordinator vacancy	Rule	<p>Upon request by the Agency or any Support Coordinator vacancy, which means absence or unavailability in excess of 30 calendar days, the Qualified Organization must submit the following information regarding that Support Coordinator to the appropriate Regional Office that includes:</p> <ul style="list-style-type: none"> <li>(a) A list of the clients affected by the absence;</li> <li>(b) The beginning and end dates of the vacancy;</li> <li>(c) The name(s) of a temporary Support Coordinator who will serve the affected clients;</li> <li>(d) If the Support Coordinator involuntarily left the Qualified Organization, the reason for that Support Coordinator leaving.</li> </ul>
	Cost Estimation	<p>Currently when there is a vacancy, a PA must submit (a) and (b). Assuming it takes 15 minutes to file for a vacancy, the cost is (749 vacancies)*(0.25 hour)*(\$20/hour) = \$3,745 per year.</p>
	<p>This is just a matter of gathering the information needed and submitting them to APD. The cost driver is the number of WSC vacancies per year. A WSC vacancy may occur when a WSC switches to another QO or leaves the industry. We can again use 749 as the high estimate for the number of WSC vacancies each year. 749 is a high estimate because, in the current regulatory environment a WSC may switch between being a solo provider and being hired by a PA, while in the new regulatory environment a WSC can only switch between QOs. Also, some of the vacancies may be filled within 30 days. Assuming a QO takes 30 minutes to file for a vacancy, the high estimate of the cost is (749 vacancies)*(0.50 hour)*(\$20/hour) = \$7,490 per year.</p>	

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Mentoring	Rule	In addition to completing required training as provided in the iBudget Handbook and Rule 65G-10.004, F.A.C., any person who has worked as a Waiver Support Coordinator for less than 12 months before joining the Qualified Organization must complete an Agency-approved mentoring program offered by his or her Qualified Organization	No current requirement.
	Cost Estimation	<p># of WSCs with less than 12 months experience (160) * mentoring hours while cannot take a caseload (0) * \$20 = \$0</p> <p>Filling out the form: 160 * 1 hour * \$40 = \$6,400 (annual)</p>	

After receiving comments, APD has drafted Rule 65G-14.0043 to permit mentees to carry a caseload prior to completing the mentoring program, with oversight from the mentor. The mentoring program is required by section 393.0663(2)(b)12., but filling out the form reflecting successful completion is attributed to the rule.